

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RIMSYS, INC.,)	
)	
Plaintiff,)	Civil Action No. 2:23-cv-01630-WSH
)	
v.)	
)	JURY TRIAL DEMANDED
KAREN COHN,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Rimsys, Inc. (“Rimsys”) and Defendant Karen Cohn (“Cohn”) (Rimsys and Cohn are collectively referred to as the “Parties”), by and through their undersigned counsel, and pursuant to Rule 26 of the Federal Rules of Civil Procedure, do hereby move the Court for entry of a Protective Order, and, in support of this Motion, state as follows:

1. The Parties agree that confidential commercial, technical, financial and/or otherwise sensitive information will be exchanged during the litigation the above-captioned case.
2. Rule 26 of the Federal Rules of Civil Procedure permits the Court, for good cause, to enter an appropriate protective order outlining the manner in which confidential information may be discovered, produced, disclosed and handled in the pending action.
3. The Parties have in good faith conferred and have agreed upon the terms and conditions of a stipulated Protective Order, which is attached hereto as **Exhibit A**, subject to the approval of this Court.

WHEREFORE, the Parties hereby request the Court enter the attached stipulated Protective Order, and grant such further relief as the Court deems appropriate.

Dated: September 21, 2023

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*ATTORNEYS FOR DEFENDANT
KAREN COHN*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Joint Motion for Entry of Protective Order was electronically filed and served by use of the court's ECF system.

/s/Antoinette C. Oliver
Antoinette C. Oliver